

Claims 1, 4 to 10, 13 to 17 and 20 to 23 are in the application, of which Claims 1, 6, 9, 10, 15 to 27, 22 and 23 are independent. Reconsideration and further examination are respectfully requested.

In the Office Action, all claims were rejected under 35 U.S.C. § 103(a), primarily over U.S. Patent No. 5,408,469 (Opher) in view of U.S. Patent No. 5,890,162 (Huckins). Thus, Claims 1, 5, 10, 14, 17 and 21 were rejected under Opher in view of Huckins, and Claims 4, 6 to 9, 13, 15, 16, 20, 22 and 23 were rejected over Opher in view of Huckins and further in view of U.S. Patent No. 6,476,833 (Moshfeghi). The rejections are respectfully traversed.

The invention concerns retrieval of a fragment of an audio/video (AV) resource in which a fragment identifier is determined for a representation of the AV fragment by applying an addressing scheme to the fragment identifier (or, to the fragment representation) in which the addressing scheme is for addressing temporal and spatial fragments of the AV resource. In relation to “temporal fragments”, the specification states that page 11, lines 13 to 16 (in terms of a non-limiting embodiment) that a user is able to select an arbitrary fragment of audio content on CDROM 312 by specifying a fragment address or a fragment identifier using indexing as shown in Figure 3. In relation to “spatial fragments”, the specification states at page 12, lines 18 to 22 (in terms of a non-limiting embodiment) that a user is able to select an arbitrary spatial fragment of video content on a specified frame of CDROM 724 by specifying a fragment address or fragment identifier that depends on the title.

It should therefore be understood that the invention involves an addressing scheme for addressing a temporal fragment and for addressing a spatial fragment of the AV

resource. In the context of an AV resource, the possible existence of both types of fragments (namely, a spatial fragment and a temporal fragment) is consistent with the nature of the resource itself.

In contrast, the primary reference to Opher is related to the routing of packets into an Asynchronous Transfer Mode (ATM) switch. The nature of the information carried in the ATM packets is not disclosed by Opher, and it is most certainly not disclosed as being an AV resource. It is therefore unreasonable to conclude that Opher contains anything concerning addressing of both temporal and spatial fragments of an AV resource.

Page 3 of the Office Action stated (at paragraph 7(c) thereof) that Opher discloses an addressing scheme for addressing temporal and spatial fragments of an AV resource, relying on lines 5 to 10 of Opher's column 6:

“ATM has been the official name adopted by the CCITT for such a network. Asynchronous Time Division (ATD) and Fast Packet Switching are terms which have been employed to describe similar transfer modes. These alternative networks are discussed in De Prycker at pages 55-56” (Opher, column 6, lines 5 to 10).

Opher discusses Asynchronous Time Division (ATD) but it is not understood how ATD would disclose or suggest a scheme for addressing both temporal fragments (which refer to time-based fragments) as well as for addressing spatial fragments (which refer to space-related fragments) of an AV resource.

The Office Action concedes that Opher does not disclose anything concerning an AV resource being carried on his ATM network. Reliance was placed on Huckins for such a feature, but even with such reliance, it is respectfully submitted that

there is nothing in Huckins that describes application of an addressing scheme to a fragment identifier (or fragment representation) for addressing temporal and spatial fragments of the AV resource.

Specifically, Huckins discloses a method for creating remote multimedia outputs on client computers by sending a stream of semantics from a server computer to a client computer. In response to each semantic received by a client computer, the client computer processes a multimedia object previously stored thereon. Huckins discloses a data packet containing a data object identifier and an action identifier, and the client computer is able to manipulate a locally-stored data object on the basis of the action identifier.

It is therefore not understood how Huckins has been interpreted so as to disclose an AV resource, and it is most certainly not understood how Huckins might disclose or suggest addressing of such an AV resource. To the extent that Huckins might disclose a multimedia data object, then all such objects are manipulated locally which is not the same as “addressing”. In fact, the disclosure of Huckins has been reviewed but the only disclosure of “addressing” in Huckins is found in relation to data object identifier 52 in the data packet of Figure 2. However, this address points to a locally-stored multimedia data object, and not to a spatial fragment.

Therefore, it is respectfully submitted that any permissible combination of Opher and Huckins would not disclose or suggest the subject matter claimed herein. In particular, any permissible combination of Opher and Huckins would not disclose or suggest that with respect to a fragment of an AV resource, a fragment identifier is determined for a representation of the AV fragment by applying an addressing scheme to

the fragment identifier (or to the fragment representation) in which the addressing scheme is for addressing temporal and spatial fragments of the AV resource.

With respect to the citation to Moshfeghi, it is Applicant's understanding that Moshfeghi is directed to the provision of functionality for a configurable mark-up language browser embedded in the context of a client-server application running on standard-user devices. However, Moshfeghi is not seen to disclose or to suggest anything pertaining to the above-noted deficiencies of Opher and Huckins, and in particular, is not understood to disclose or to suggest the addressing of temporal and spatial fragments of an AV resource.

It is therefore respectfully submitted that the claims herein are fully in condition for allowance, and withdrawal of the rejection of the claims is therefore respectfully requested.

Applicant's undersigned attorney may be reached in our Costa Mesa,  
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our below-listed address.

Respectfully submitted,

A handwritten signature in dark ink, appearing to read "Michael K. O'Neill", written over a horizontal line.

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